

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

ROGER PARKER,

Plaintiff,

v.

PERDUE FOODS LLC,

Defendant.

Case No. 5:22-cv-00268-TES

**PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL  
CERTAIN DOCUMENTS IN SUPPORT OF OPPOSITION TO SUMMARY  
JUDGMENT**

Plaintiff Roger Parker (“Plaintiff” or “Mr. Parker”) respectfully moves this Court for leave to file provisionally under seal certain documents in support of his Motion for Summary Judgment. Defendant Perdue Foods, LLC (“Perdue”) and various third parties have designated certain documents as “CONFIDENTIAL” under the protective order in this case, including the following documents, which Plaintiff wishes to file to support his Opposition to Defendant’s Motion for Summary Judgment and accompanying filings:

- Perdue 1511 – Perdue 1578 (“Exhibit F”)
- FFB\_000287 (“Exhibit I”)
- NCC-3P-007605 (“Exhibit J”)
- Perdue 005615 – Perdue 006375 (“Exhibit K”)
- Perdue 001579 – Perdue 001626 (“Exhibit L”)
- Perdue 007688 (“Exhibit O”)
- Perdue 002252 – Perdue 003124 (“Exhibit R”)
- Perdue 001627 – Perdue 001711 (“Exhibit T”)

- Perdue 006376 – Perdue 006839 (“Exhibit U”)
- Perdue 008011 – Perdue 008012 (“Exhibit V”)
- Perdue 008030 – Perdue 008034 (“Exhibit W”)
- Perdue 007976 – Perdue 007978 (“Exhibit Z”)
- Perdue 008068 (“Exhibit BB”)
- Perdue 008067 (“Exhibit DD”)
- Perdue 007729 (“Exhibit EE”)
- Perdue 007713-007722 (“Exhibit FF”)
- Perdue 001919 – Perdue 002251 (“Exhibit GG”)
- Perdue 007710 – Perdue 007722 (“Exhibit HH”)
- Perdue 007565-007577 (“Exhibit II”)
- Perdue 007514 – Perdue 007526 (“Exhibit JJ”)
- Perdue 007005 – Perdue 007017 (“Exhibit KK”)
- Perdue 006992 – Perdue 007004 (“Exhibit LL”)
- Perdue 007620 (“Exhibit MM”)
- Perdue 003125 – Perdue 3567 (“Exhibit RR”)
- Perdue 005075 – Perdue 005614 (“Exhibit SS”)
- Perdue 008907 – Perdue 008100 (“Exhibit TT”)
- Perdue 000001 – Perdue 001251 (“Exhibit UU”)
- Perdue 003849 – Perdue 003951 (“Exhibit VV”)
- FFB\_000151 – FFB\_000159 (“Exhibit XX”)
- FFB\_000168 – FFB\_000171 (“Exhibit YY”)
- FFP\_001239 (“Exhibit AAA”)

- Exhibits 20, 24, and 30 to “Exhibit M” (Deposition of Kathryn Mizell)
- Exhibit 9 to “Exhibit Q” (Deposition of Roger Parker)

*See generally* Protective Order (dkt. 47). Therefore, to preserve Perdue’s and third parties’ confidentiality designations, Plaintiff is “seeking permission to file the[se] document[s] under seal,” as the protective order contemplates. *Id.* at 7. Consistent with this Court’s guidance on filing motions for seal (<https://www.gamd.uscourts.gov/submitting-documents-court>), Plaintiff is submitting PDF copies of these documents to the appropriate divisional email address.

Counsel for Plaintiff has contacted Defendant, and Defendant has indicated that it does not oppose this motion.

Under section 6 of the Protective Order, Perdue or the relevant third party, as the designating party, has the burden to demonstrate that this material should remain under seal. *See id.* Plaintiff takes no position at this time whether any portion of these materials is properly sealed. Plaintiff does, however, note that the public interest weighs in favor of public disclosure. Nonetheless, Plaintiff requests that these documents be filed under seal for the limited purposes of: (i) permitting Perdue and the relevant third parties an opportunity to make a showing of good cause as to which portions (if any) should remain under seal, and (ii) allowing the Court, under the procedures set forth in the Protective Order and this Court’s rules, to assess Perdue’s and the third parties’ position on whether such documents should be permanently sealed.

For these reasons, Plaintiff respectfully requests that the Court seal the above-listed documents but lift that seal and permit the public filing of these documents in the event the Court determines that Perdue has failed to meet its burden of demonstrating “good cause” for sealing these documents.

Dated: August 18, 2025

Respectfully submitted,

/s/ Jamie Crooks

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this day, I caused a true and correct copy of the foregoing document to be filed with the clerk's office using this Court's CM/ECF system, which will automatically send notice of such filing to all counsel of record.

This 18th day of August, 2025.

/s/ Jamie Crooks

*Counsel for Plaintiff*